

# Exhibit 69



# **Quarterly Ethics and Compliance Report to Board of Directors for 3Q2015**

December 1, 2015

Bert Weinstein

# Bottom Line

Purdue continues to have strong systems and processes in place to prevent and detect violations of law, regulations, and Company policies, and to remediate issues before they become significant problems.

***There have been no significant compliance issues in the 3rd quarter, 2015***

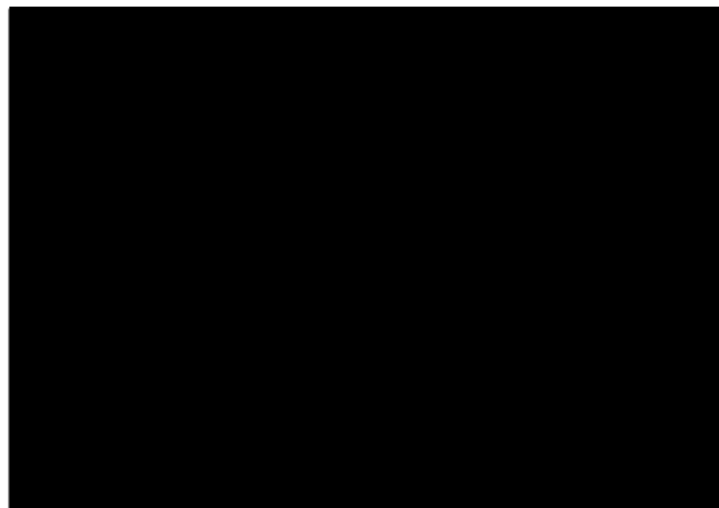
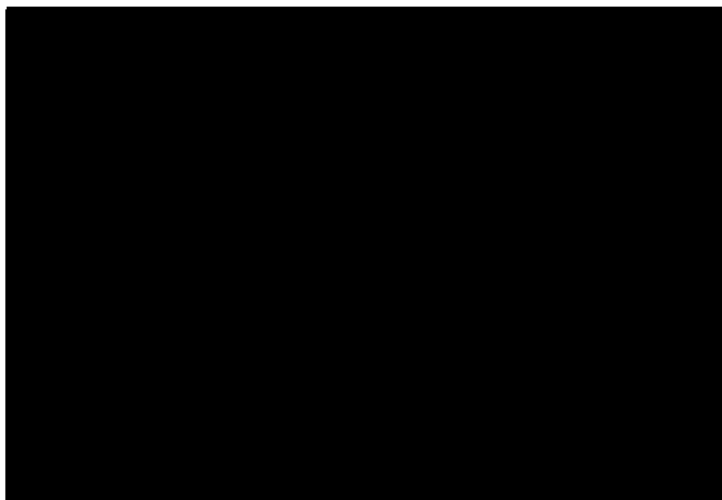
This report focuses on our Department's renewed focus on ethical awareness, and on social media policy at Purdue



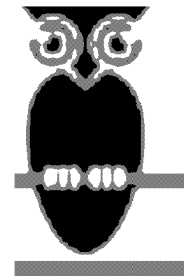
# Focus on Ethics Awareness

## Purdue has Rebranded Corporate Compliance as the “Ethics and Compliance Department”

- Why? Compliance is law and regulations-based, whereas ethics is more encompassing and value-based, to promote employees to think through issues when there is no clear direction otherwise
- The week of November 16th ushered in our first Ethics Awareness Week at Purdue, with activities and materials that have received very positive feedback, including an opportunity for employees to “brand” themselves!

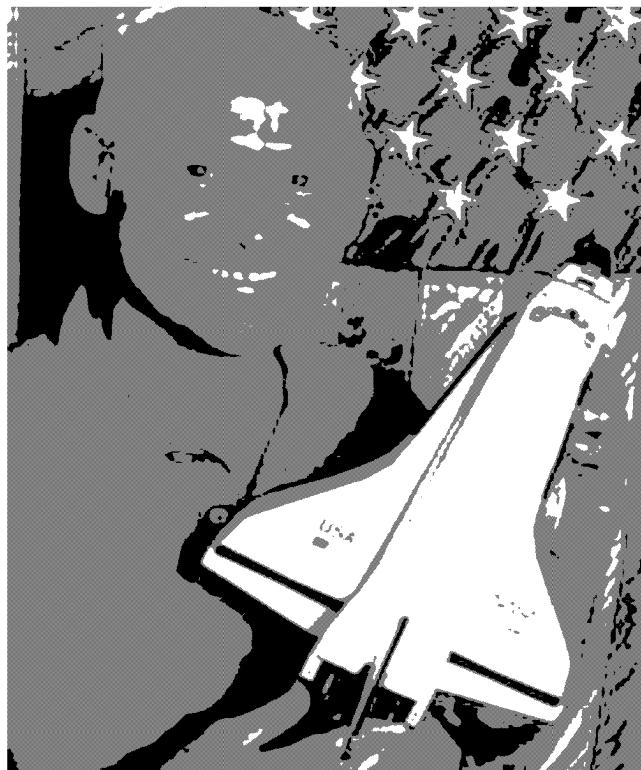


# Focus on Ethics Awareness



The centerpiece of Ethics Week was a talk by Astronaut Mike Mullane about ethics, safety, quality, and leadership, tied in to his experience with NASA and three shuttle trips.

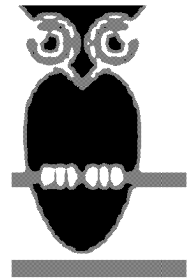
- Two-thirds of all non-field employees participated at all sites
- Employee feedback has been very positive, both for Mullane's talk, and for the added focus on ethics.





ALWAYS ► ALL WAYS

# Investigation Matters

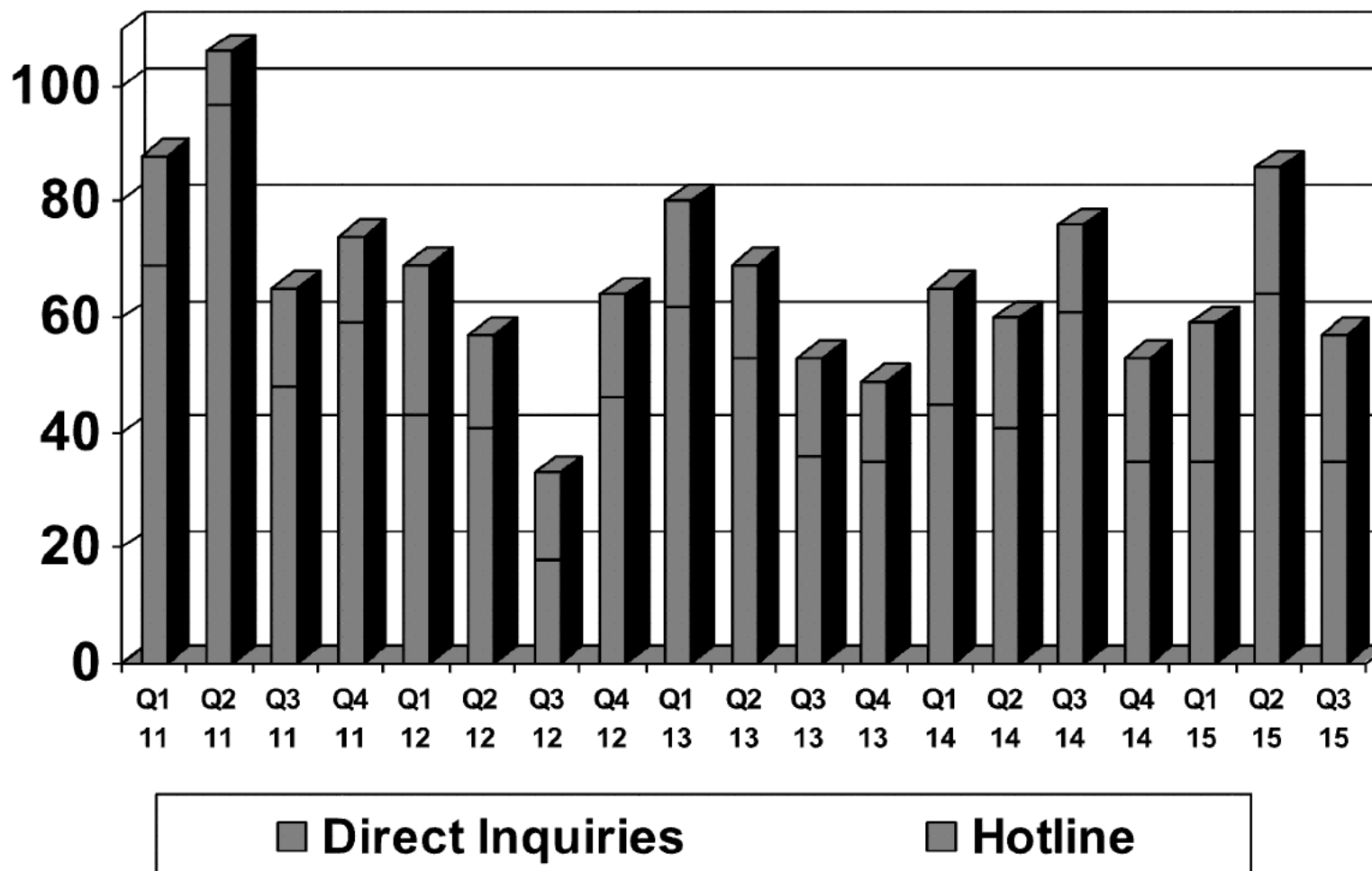


During the August Board meeting, it was requested that we continue past practice of providing the Board with quarterly data on matters that have been investigated; see following slide.

It is noted that none of the matters are significant, and generally concern inquiries by patients, appropriate product messaging by the field, Adverse Events, and preparation of call notes, for which remediation has included coaching, warning letters and bulletins to the field.



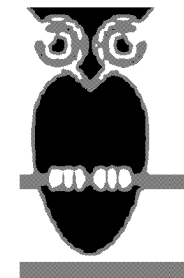
# Matters by Quarter (1Q11 – 3Q15)



Data through Q3 2015



# Social Media



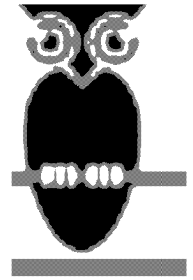
During the August Board meeting, a question was raised about Purdue's social media policy







# Current FDA Social Media Guidance



FDA's draft guidances leave unanswered questions, but it is clear that:

- FDA's view is that claims made on the internet constitute labeling, within the ambit of their authority to regulate labeling of drugs
- Basic Rules of promotion apply- social media must be:
  - Truthful and non-misleading
  - Balanced in the presentation of risks and benefits
- Manufacturers *may* be deemed responsible for content with third parties employed by the manufacturer



# Social Media



Purdue has a restrictive social media policy:

- Business Use: Only a limited group of designated individuals is permitted to post to social media sites and any content posted must be fully vetted and approved via Material Review or Law Department.
- Personal Use: Commenting, liking, or sharing information on social media about Purdue or others' products is impermissible
- Rules Applicable to all employees and certain contractors:
  - Adverse events and/or product complaints learned of on social media must be reported to the Drug Safety & Pharmacovigilance Department.
  - Misinformation about the use or safety of our products must be reported to Medical Services.